

EXHIBIT A



U.S. Department of Justice

*United States Attorney
Southern District of New York*

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BY EMAIL

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Re: **United States v. Reza Zarrab et al.,**
S3 15 Cr. 867 (RMB)

Dear Counsel:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the Government hereby provides notice of the expert testimony that it intends to offer at trial in the above-referenced case.

Expert Testimony Concerning History of Sanctions Evasion Practices in Iran and Turkey

The Government expects to call Mark Dubowitz, of the Foundation for Defense of Democracies ("FDD"), as a witness at trial. A copy of Mr. Dubowitz's resume is enclosed. If called, Mr. Dubowitz is expected to testify about the history of U.S. sanctions against Iran and the Iranian response to those sanctions, including:

- The repeated imposition of economic sanctions by the United States against the Islamic Republic of Iran, the actions by Iran that caused the United States to impose sanctions, and the goals of the United States' sanctions against Iran. This testimony would include Iran and its Islamic Revolutionary Guard Corps (the "IRGC")'s support of terrorism and foreign terrorist groups (including Hezbollah).
- Iran's "Economic Jihad" and adoption of a "resistance economy," and the various and evolving methods Iran used to evade U.S. and European sanctions, including its exploitation of the international financial system, bulk shipping of cash, illegal transfers of Iranian oil, and illicit procurement activity.
- The role that key players in the Iranian government, economy, and society played in Iran's attempt to evade U.S. sanctions, including the IRGC. This testimony would include the IRGC's role in the Iranian government and economy, including its control over various sectors of the Iranian economy and its use of different corporate entities to conduct and conceal its commercial activity.
- The negotiation of and impact of the Joint Comprehensive Plan of Action (the "JCPOA").

The Government also expects to call Dr. Jonathan Schanzer of FDD as a witness at trial. A copy of Dr. Schanzer's resume is enclosed. If called, the Government anticipates that Dr. Schanzer would testify about the relationship between the Republic of Turkey and Iran and Turkey's role in Iran's sanctions evasion efforts, including:

- The economic and political ties between Turkey and Iran, including the history of imports and exports between the two countries and connections between their two governments.
- Turkey's role in Iran's sanctions evasion activity, including the role played by Turkey and its financial institutions in the so-called "gas-for-gold" scheme involving the repatriation of Iranian oil proceeds to Iran in violation of U.S. sanctions.
- The role and usage of U.S. dollars as a standard currency for pricing and settlement of transactions involving precious metals and petroleum products.
- Patterns of financial activity that are consistent with money laundering, including trade-based money laundering, and sanctions evasion.

Expert Testimony Concerning the Office of Foreign Assets Control

The Government also expects to call a representative of the Office of Foreign Assets Control ("OFAC"), United States Department of the Treasury, as a witness at trial. The biographical information and/or curriculum vitae will be provided when the specific individual witness has been identified. If called, the Government anticipates that the witness will testify as to the nature of the Iran-related economic sanctions programs administered by OFAC, including:

- The nature of and authorities provided to OFAC by certain statutes, executive orders, and implementing regulations, including the International Emergency Economic Powers Act, the Comprehensive Iran Sanctions, Accountability and Divestment Act, the National Defense Authorization Act, the Weapons of Mass Destruction Proliferators Sanctions Regulations, the Iranian Transactions and Sanctions Regulations, and the Iranian Financial Sanctions Regulations.
- OFAC's licensing, designation, and enforcement authority.
- The identification and/or designation of Iranian banks, companies, and government entities pursuant to various OFAC authorities.
- The existence and/or non-existence of licenses relating to certain counterparty entities or classes of transactions involved in this case.

Expert Testimony Concerning Standard Banking Industry Practices

The Government also expects to call one or more representatives of major international banks as witnesses at trial. The biographical information and/or curriculum vitae will be provided when the specific individual witnesses have been identified. If called, the Government anticipates that, among other things, the witnesses will testify as to standard practices in the banking industry regarding the maintenance of correspondent banking relationships, the operation of wire transfers and the interpretation of wire transfer instructions (*i.e.* SWIFT messages), the settlement of foreign currency transactions, and policies and procedures designed to combat money laundering and sanctions evasion.

Pursuant to Rule 16(b)(1)(C), the Government hereby demands reciprocal notice regarding any expert witness that the defendants intend to rely upon, including a written summary of any testimony that the defendant intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence. Such summary shall include the witness's opinions, the bases and reasons for those opinions, and the witness's qualifications.

Very truly yours,

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